

The Honorable Chief Judge Ricardo S. Martinez  
The Honorable U.S. Magistrate Judge Brian Tsuchida

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

IAN PERRY,

Plaintiff,

vs.

STATE OF WASHINGTON,  
WASHINGTON STATE  
DEPARTMENT OF CORRECTIONS,  
ARIEG AWAD, MARQUETTA  
WASHINGTON, and DOES 1-X  
inclusive,

Defendants.

NO. 2:20-cv-01622-RSM-BAT

STIPULATED MOTION TO  
FURTHER EXTEND DEADLINE  
FOR MEDIATION

NOTE ON MOTION CALENDAR:

January 28 , 2022

COMES NOW the parties, by and through their counsel of record, and by agreed stipulation respectfully request that this Court extend the current case scheduling order deadline for mediation from January 28, 2022 (Dkt. 45) to March 31, 2022. The parties are currently awaiting the Court's review and consideration of the Magistrate's Report and Recommendation, the parties' objections and responses to the Report and Recommendation and a determination on DOC Defendants' motion for summary judgment. (Dkts. 45, 48, 49, 50, 51). The parties agree that a new deadline of Friday, March 31, 2022, should provide ample time for the Court to issue its decision and then, if necessary, for all parties to participate in mediation in this case. The

1 parties have conferred with each other regarding this motion and the defendants have stipulated  
2 to the four-month extension of the deadline for mediation.

3 STIPULATED AND AGREED TO this 28th day of January, 2022.  
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5 CIVIL RIGHTS JUSTICE CENTER, PLLC

6 /s/ Darryl Parker (signature authorized by email)

7 Darryl Parker, WSBA #30770

8 Attorney for Plaintiff

9 ROBERT W. FERGUSON

10 Attorney General

11 /s/Michelle H. Hansen

12 MICHELLE H. HANSEN, WSBA No. 14051

13 Assistant Attorney General

14 Attorneys for Defendants State of Washington,

15 Its agency Department of Corrections and Areig Awad

16 WILLIAMS KASTNER

17 /s/Heidi L. Mandt (signature authorized by email)

18 HEIDI L. MANDT, WSBA #26880

19 Attorney for Defendant Marquette Washington  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of January, 2022, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Darryl Parker – Attorney for Plaintiff  
Civil Rights Justice Center PLLC  
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Heidi L. Mandt – Attorney for Defendant Marquetta Washington  
Williams Kastner  
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DATED this 28th day of January, 2022.

ROBERT W. FERGUSON  
Attorney General

/s/Michelle Hitomi Hansen  
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